

HATFIELD & ASSOCIATES, LTD.  
703 8<sup>th</sup> Street \* Las Vegas, Nevada 89101  
Telephone (702) 388-4469

1 TREVOR J. HATFIELD, ESQ  
2 Nevada Bar No. 7373  
3 HATFIELD & ASSOCIATES, LTD.  
4 703 S. Eighth Street  
5 Las Vegas, Nevada 89101  
6 Telephone: (702) 388-4469  
7 Facsimile: (702) 386-9825  
8 Email: [thatfield@hatfieldlawassociates.com](mailto:thatfield@hatfieldlawassociates.com)

9 *Attorney for Plaintiffs*

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 ELISEO NAPOLES, MARIE NAPOLES  
13 AND M.N., A MINOR, BY AND  
14 THROUGH HIS GUARDIAN AD LITEM,

15 Plaintiffs,

16 vs.

17 CLARK COUNTY SCHOOL DISTRICT,  
18 DOES I through X, inclusive; ROE  
19 CORPORATIONS I through X, inclusive

20 Defendant.

CASE NO: 2:19-cv-01474-APG-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFFS TO  
RESPOND TO DEFENDANT'S MOTION  
FOR SUMMARY JUDGMENT  
(Second Request)**

21 COMES NOW, Plaintiffs, ELISEO NAPOLES, MARIE NAPOLES AND M.N., A  
22 MINOR, BY AND THROUGH HIS GUARDIAN AD LITEM (hereinafter, "Plaintiffs"), by and  
23 through their counsel, the law firm of Hatfield & Associates, Ltd., and Defendant CLARK  
24 COUNTY SCHOOL DISTRICT (hereinafter "Defendant"), by and through its counsel, Phoebe  
25 V. Redmond, Esq., and Crystal J. Herrera, Esq., of the Clark County School District Office of  
26 the General Counsel, do hereby stipulate and agree to extend time for Plaintiffs to respond to  
27 Defendant's Motion For Summary Judgment (ECF #35). This request is submitted pursuant to  
28 LR IA 6-1, 6-2 and LR II 7-1 and is the parties' second request for an extension of time for  
Plaintiffs to respond to Defendant's Motion for Summary Judgment.

///

Good cause exists for this extension, as Plaintiffs' counsel needs to confer with his clients regarding the facts of the attendant motion and to formulate Plaintiffs' response. As Plaintiffs' first language is Spanish and their understanding of English is very poor, a translator is required to review draft Declarations which requires additional time to confer with Plaintiffs.

Accordingly, Plaintiff shall have up to and including September 17, 2021, to respond to Defendant's Motion for Summary Judgment (ECF #35). Defendant's reply to Plaintiffs' response will be adjusted accordingly.

Dated: September 9, 2021

Dated: September 9, 2021

HATFIELD & ASSOCIATES, LTD.

CLARK COUNTY SCHOOL DISTRICT  
OFFICE OF THE GENERAL COUNSEL

*/s/ Trevor J. Hatfield*

*/s/ Phoebe V. Redmond*

By: \_\_\_\_\_  
TREVOR J. HATFIELD, ESQ.  
Nevada Bar No. 7373  
703 South Eighth Street  
Las Vegas, Nevada 89101  
Tel.: (702) 388-4469  
Email: [thatfield@hatfieldlawassociates.com](mailto:thatfield@hatfieldlawassociates.com)  
*Attorney for Plaintiffs*

By: \_\_\_\_\_  
PHOEBE V. REDMOND, ESQ.  
Nevada Bar No. 9657  
CRYSTAL J. HERRERA, ESQ.  
Nevada Bar No. 12396  
5100 West Sahara Avenue  
Las Vegas, Nevada 89146  
Tel.: (702) 799-5373  
Email: [redmopv@nv.ccsd.net](mailto:redmopv@nv.ccsd.net)  
Email: [herrec4@nv.ccsd.net](mailto:herrec4@nv.ccsd.net)  
*Attorneys for Clark County School District*

**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT COURT JUDGE

DATED: September 10, 2021

HATFIELD & ASSOCIATES, LTD.  
703 8<sup>th</sup> Street \* Las Vegas, Nevada 89101  
Telephone (702) 388-4469